



PTO/SB/21 (09-04)

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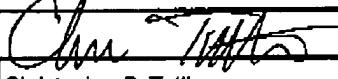
TRANSMITTAL FORM

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		Application Number	10/805,651
		Filing Date	March 19, 2004
		First Named Inventor	Donald J. Lewis
		Art Unit	3747
		Examiner Name	Arnold Castro
Total Number of Pages in This Submission	3	Attorney Docket Number	81092775

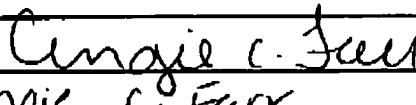
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SIGNATURE OF APPLICANT, ATTORNEY, OR AGENT

Firm Name	Allerman Hall McCoy Russell & Tuttle LLP		
Signature			
Printed name	Christopher S. Tuttle		
Date	February 13, 2006	Reg. No.	41,357

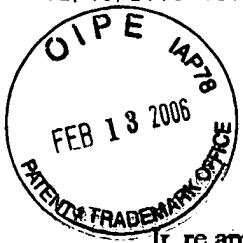
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This collection of information is required by 37 CFR 1.5. The information is required to obtain or retain a benefit by the public which is to file (and by the USPTO to process) an application. Confidentiality is governed by 35 U.S.C. 122 and 37 CFR 1.11 and 1.14. This collection is estimated to 2 hours to complete, including gathering, preparing, and submitting the completed application form to the USPTO. Time will vary depending upon the individual case. Any comments on the amount of time you require to complete this form and/or suggestions for reducing this burden, should be sent to the Chief Information Officer, U.S. Patent and Trademark Office, U.S. Department of Commerce, P.O. Box 1450, Alexandria, VA 22313-1450. DO NOT SEND FEES OR COMPLETED FORMS TO THIS ADDRESS. SEND TO: Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450.

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re application of:

February 13, 2006

DONALD J. LEWIS, JOHN D. RUSSELL and NATE TRASK

Serial No.	:	10/805,651	Group Art Unit: 3747
Filed	:	March 19, 2004	Examiner: Arnold Castro
For	:	QUICK STARTING AN ENGINE WITH ELECTROMECHANICAL VALVES	

Commissioner for Patents
 P O. Box 1450
 Alexandria, Virginia 22313-1450

Sir:

COMMENTS ON STATEMENT OF REASONS FOR ALLOWANCE

Applicants received a Notice of Allowance dated November 16, 2005, on the above-identified patent application. In the Notice, the Examiner allowed claims 31-52. The Examiner also paraphrased applicant's claimed invention as part of the stated reasons for allowance. Applicant agrees with the Examiner's conclusions regarding the patentability of the allowed claims, without necessarily agreeing with or acquiescing in the Examiner's reasoning. In particular, applicant believes that the application is allowable because the prior art fails to teach or suggest the invention as claimed, independent of how the invention is paraphrased.

Please contact the undersigned if you have any questions or comments, or if applicant can be of any assistance in expediting issuance of the patent.

CERTIFICATE OF FACSIMILE

I hereby certify that this correspondence is being sent via facsimile to the U.S. Patent and Trademark Office at (571)273-2885 on February 13, 2006.

*Angie C. Jaen
 Angie C. Farr*

Respectfully submitted,
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